

## DOCKETED

<b>Docket Number:</b>	16-RPS-02
<b>Project Title:</b>	Appeal by Los Angeles Department of Water & Power re Renewables Portfolio Standard Certification Eligibility
<b>TN #:</b>	214645
<b>Document Title:</b>	Joint Request for Extension of Time to File Joint Statement of Agreement Due on December 6, 2016
<b>Description:</b>	N/A
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<b>Docketed Date:</b>	12/6/2016

**BEFORE THE ENERGY RESOURCES CONSERVATION AND  
DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of:

Appeal by LADWP re  
RPS Certification or Eligibility

Docket No.: 16-RPS-02

**JOINT REQUEST FOR EXTENSION OF TIME TO FILE JOINT STATEMENT OF  
AGREEMENT DUE ON DECEMBER 6, 2016**

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December 6, 2016

**BEFORE THE ENERGY RESOURCES CONSERVATION AND  
DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of:

Appeal by LADWP re  
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**JOINT REQUEST FOR EXTENSION OF TIME TO FILE JOINT STATEMENT OF  
AGREEMENT DUE ON DECEMBER 6, 2016**

California Energy Commission Staff (Staff) and the City of Los Angeles, acting by and through the Department of Water and Power, a municipal corporation (LADWP) respectfully submit this joint request for an extension of time to file the joint statement of points of agreement requested under the Committee report of November 22, 2016, *Summary of Committee Report After November 22, 2016, Closed Session* (Report),<sup>1</sup> which encouraged Staff and LADWP to continue discussions to see if they have additional points of agreement. The Report asked Staff and LADWP to file a joint written summary of any agreements or statement that none have been reached (Joint Statement) by no later than December 6, 2016.

Staff and LADWP have conferred to discuss possible points of agreement and opportunities to narrow and order the scope of issues before the Committee. Staff and LADWP are still working on proposed points of agreement, but require additional time to discuss the proposed form and substance of the agreements. Staff and LADWP, therefore, request that the Committee extend the deadline to file the Joint Statement from December 6, 2016 until **December 9, 2016**. The request for an extension is intended to provide Staff and LADWP with additional time to reach additional points of agreement in the dispute and potentially narrow the scope of disputed facts or issues pending before the Committee. The failure to grant the request for extension would likely result in the filing of a Joint Statement that no additional agreements have been reached by the parties because of time constraints.

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<sup>1</sup> TN 214546.

Accordingly, Staff and LADWP respectfully request that the Committee grant the request and extend the time to file the Joint Statement from December 6, 2016 until **December 9, 2016**, by no later than 5:00 p.m.

Dated this 6<sup>th</sup> of December 2016

Respectfully submitted,

*/S/ Gabriel Herrera*

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*/S/ Felix Lebron*

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